

REPORTS ANALYSIS DIVISION REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: June 18, 2015

ANALYST: Laura Beaufort

- I. COMMITTEE: Hall for Congress Committee (Ralph Hall - Rockwell, Texas)
C00120683
J. Blakeley Hall, Treasurer
P.O. Box 711
Rockwall, TX 75087
- II. RELEVANT STATUTES: 52 U.S.C. § 30104(b)(8)
11 CFR § 104.3(d)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Hall for Congress (Ralph Hall - Rockwall, Texas) ("the Committee") amended its 2014 July Quarterly Report to disclose an increase in debts totaling \$330,000.00, which were not disclosed in the original report (Attachments 2 and 3).

On July 15, 2014, the Committee filed the original 2014 July Quarterly Report, covering the period from May 8, 2014 through June 30, 2014. The report disclosed no debts¹ on Line 10 (Debts and Obligations Owed by the Committee) of the Summary Page (Image 14961579955; Attachment 2).

On January 27, 2015, the Committee filed an Amended 2014 July Quarterly Report disclosing \$150,000.00 in debts on Line 10 of the Summary Page, all of which were incurred during the reporting period (Image 15970051872). The report also

¹Line 10 (Debts and Obligations Owed by the Committee) includes both loans and debts owed to the Committee. The Committee disclosed \$148,790.44 in loans on Line 10 of their 2014 July Quarterly Reports.

included memo text attached to the debt which stated, "This amount is just an estimate. The total amount of the debt owed is still being determined" (Image 15970051934).

On March 3, 2015, a Request for Additional Information (RFAI) was sent to the Committee referencing the Amended 2014 July Quarterly Report, received January 27, 2015. The RFAI requested clarification regarding the significant increase in debts that were disclosed in the amended report (Image 15330077883).

On March 18, 2015, Jody Hall, the Committee's Custodian of Records, called the Reports Analysis Division (RAD) Analyst in response to the RFAI regarding the increase in activity disclosed on the Amended 2014 July Quarterly Report, received January 27, 2015. Ms. Hall asked how she could best respond to the letter, as the activity was not included in the report due to oversight. The Analyst explained that the best way to respond to the RFAI was to file a Miscellaneous Electronic Submission ("FEC Form 99") to explain what caused the increase and what steps the Committee planned to take to prevent the issue from reoccurring (Attachment 4).

On the same day, the Committee filed an FEC Form 99 in response to the RFAI, which stated, in part:

"The information disclosed on our amendment was not included on the original report due to on oversight by our committee. We are aware that this information is required for full public disclosure and are reviewing our reporting procedures to insure that our Committee's reports include all activity required by the Federal Election Commission" (Image 15950875767).

On April 13, 2015, the RAD Analyst called J. Blakeley Hall, the Committee's Treasurer, to notify him that the matter involving increased activity on the Amended 2014 July Quarterly Report, received January 27, 2015, would be referred for further Commission action. The Analyst stated that the Committee had the option to provide additional information for the public record regarding this issue. Mr. Hall indicated that he would speak with Ms. Hall and call back (Attachment 4).

On April 14, 2015, Mr. Hall called the RAD Analyst and stated that the disclosed increase of debt listed on the Amended 2014 July Quarterly Report, received January 27, 2015, was an aggregate of debts incurred over the course of the election cycle. The Analyst advised that the Committee should report debts exceeding \$500 on the report covering the date on which the debt was incurred. Mr. Hall said there was a list of dates and amounts and that he would get the information to update the report (Attachment 4).

On the same day, the Committee filed an Amended 2014 July Quarterly Report disclosing \$330,000.00 in debts on Line 10 of the Summary Page, all of which were incurred during the reporting period (Image 15970343772; Attachments 2 and 3). The report also included memo text attached to the debt which stated, "This amount is just an

15970343772

estimate. The total amount of the debt owed is still being determined" (Image 15970343835).

On April 14, 2015, May 6, 2015, and May 11, 2015, the RAD Analyst called and left voice mails for Mr. Hall, requesting additional information regarding the increase in debts included in the Amended 2014 July Quarterly Report, received April 14, 2015 (Attachment 4).

On May 14, 2015, the RAD Analyst called Mr. Hall to see if the increase in activity on the Amended 2014 July Quarterly Report, received April 14, 2015, was in fact reflective of the amounts incurred over the course of the election cycle, as he had stated in the conversation on April 14, 2015. Mr. Hall stated that the debt was all incurred during the 2014 July Quarterly reporting period. The Analyst verified that the debt of \$330,000.00 was incurred during the period from May 8, 2014 through June 30, 2014. The Analyst informed Mr. Hall that the matter would be referred to another Commission office for further action (Attachment 4).

To date, no further communications have been received from the Committee regarding this matter.

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O-Index (2015-2016)

Cmte. ID: C00120683 Cmte. Name: HALL FOR CONGRESS COMMITTEE (RALPH HALL - ROCKWALL, TEXAS)

Treasurer Name: HALL, J. BLAKELEY Address: POST OFFICE BOX 711, ROCKWALL, TX 75087

Cmte. Type: H (HOUSE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER

Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			1/27/2015	1	15950100476										
MS-T			3/18/2015	1	15950875767										
F3N	Q1	N	4/14/2015	16	15970343894	1/1/2015	3/31/2015		\$134,581	\$7,640	\$78,578	\$63,643	\$330,000	\$148,790	\$478,790
Totals										\$7,640	\$78,578				

O-Index (2013-2014)

Cmte. ID: C00120683 Cmte. Name: HALL FOR CONGRESS COMMITTEE (RALPH HALL - ROCKWALL, TEXAS)

Treasurer Name: HALL, J. BLAKELEY Address: POST OFFICE BOX 711, ROCKWALL, TX 75087

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Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			9/24/2013	6	13031120381										
MS-N		A	9/30/2013	1	13330039335										
MS-T			3/31/2014	1	14960568588										
MS-T			8/7/2014	1	14942423039										
RQ2	12P	A	3/18/2014	2	14330047276	1/1/2014	2/12/2014	3/18/2014							
RQ2	Q2	A	3/3/2015	2	15330077883	5/8/2014	6/30/2014	3/3/2015							
RQ2	Q2	N	8/3/2014	4	14330055775	5/8/2014	6/30/2014	8/3/2014							
RQ2	Q3	N	1/15/2015	6	15330072121	7/1/2014	9/30/2014	1/15/2015							
F3N	Q1	N	4/15/2013	35	13961605104	1/1/2013	3/31/2013		\$48,967	\$35,000	\$68,224	\$15,742		\$38,790	\$38,790
F3N	Q2	N	7/14/2013	77	13964054828	4/1/2013	6/30/2013		\$15,742	\$129,736	\$42,239	\$103,239		\$48,790	\$48,790
F3N	Q3	N	10/13/2013	49	13941769040	7/1/2013	9/30/2013		\$103,239	\$43,429	\$38,689	\$107,979		\$48,790	\$48,790
F3N	YE	N	1/29/2014	52	14940136012	10/1/2013	12/31/2013		\$107,979	\$62,050	\$58,581	\$111,447		\$48,790	\$48,790
F3N	12P	N	2/20/2014	61	14960460778	1/1/2014	2/12/2014		\$111,447	\$117,688	\$40,689	\$188,445		\$48,790	\$48,790
F3A	12P	A	2/23/2014	62	14960480283	1/1/2014	2/12/2014		\$111,447	\$118,426	\$41,528	\$188,345		\$48,790	\$48,790
F3A	12P	A	2/28/2014	63	14940542437	1/1/2014	2/12/2014		\$111,447	\$118,426	\$84,282	\$145,592		\$48,790	\$48,790
F3A	12P	A	3/6/2014	63	14940552516	1/1/2014	2/12/2014		\$111,447	\$118,426	\$89,262	\$140,592		\$48,790	\$48,790
F3A	12P	A	4/7/2014	62	14960613026	1/1/2014	2/12/2014		\$111,447	\$117,588	\$89,336	\$139,699		\$48,790	\$48,790
F3N	Q1	N	4/14/2014	83	14960680533	2/13/2014	3/31/2014		\$139,699	\$213,375	\$176,104	\$176,969		\$48,790	\$48,790
F3N	12R	N	5/15/2014	89	14941210886	4/1/2014	5/7/2014		\$176,969	\$401,010	\$141,745	\$436,234		\$148,790	\$148,790
F3A	12R	A	5/21/2014	90	14941247843	4/1/2014	5/7/2014		\$176,969	\$401,210	\$141,946	\$436,234		\$148,790	\$148,790
F3A	12R	A	5/22/2014	92	14941253113	4/1/2014	5/7/2014		\$176,969	\$401,839	\$142,574	\$436,234		\$148,790	\$148,790
F3N	Q2	N	7/15/2014	62	14961579954	5/8/2014	6/30/2014		\$436,234	\$79,318	\$225,632	\$289,920		\$148,790	\$148,790
F3A	Q2	A	1/27/2015	64	15970051871	5/8/2014	6/30/2014		\$436,234	\$79,318	\$225,632	\$289,920	\$150,000	\$148,790	\$298,790
F3A	Q2	A	4/14/2015	65	15970343771	5/8/2014	6/30/2014		\$436,234	\$79,318	\$225,632	\$289,920	\$330,000	\$148,790	\$478,790
F3N	Q3	N	10/15/2014	53	14978215423	7/1/2014	9/30/2014		\$289,920	\$3,845	\$142,654	\$151,111		\$148,790	\$148,790
F3A	Q3	A	1/27/2015	55	15970051935	7/1/2014	9/30/2014		\$289,920	\$3,845	\$142,504	\$151,261	\$150,000	\$148,790	\$298,790
F3A	Q3	A	4/14/2015	56	15951132664	7/1/2014	9/30/2014		\$289,920	\$3,845	\$142,504	\$151,261	\$330,000	\$148,790	\$478,790
F3N	YE	N	1/27/2015	20	15950111363	10/1/2014	12/31/2014		\$151,261	\$0	\$16,679	\$134,581	\$150,000	\$148,790	\$298,790
F3A	YE	A	4/14/2015	21	15970343841	10/1/2014	12/31/2014		\$151,261	\$0	\$16,679	\$134,581	\$330,000	\$148,790	\$478,790
F2		N	4/30/2013	2	13031063844										
F2		A	9/24/2013	4	13031120378										
F6N			5/17/2014	2	14960810140										
F6N			5/25/2014	1	14961228181										

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Cmte. Type: P (POSSIBLE CMTE DESIGNATION: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE))										Filing Frequency: QUARTERLY FILER					
Form Tp	Rpt Tp	A/I	Receipt Dt	Pgs	Begin Lmte	Begin Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Receipts	Disb	End Cash	Debits	Loans	Debits & Loans
R02	Q1	N	10/6/2011	2	11330014488	1/1/2011	3/31/2011	10/6/2011							
R02	12P	A	7/25/2012	4	12330009856	4/1/2012	5/9/2012	7/25/2012							
F3N	Q1	N	4/15/2011	34	11930658942	1/1/2011	3/31/2011		\$83,452	\$41,000	\$111,228	\$13,228		\$45,000	\$45,000
F3A	Q1	A	11/6/2011	40	11971821179	1/1/2011	3/31/2011		\$83,452	\$41,000	\$111,228	\$13,228		\$45,000	\$45,000
F3N	Q2	N	7/15/2011	83	11931839567	4/1/2011	6/30/2011		\$13,226	\$146,860	\$44,460	\$115,626		\$45,000	\$45,000
F3A	Q2	A	11/6/2011	85	11971821219	4/1/2011	6/30/2011		\$13,226	\$146,860	\$44,460	\$115,626		\$45,000	\$45,000
F3A	Q2	A	12/13/2011	85	11972726615	4/1/2011	6/30/2011		\$13,226	\$146,860	\$39,929	\$120,157		\$45,000	\$45,000
F3N	Q3	N	10/14/2011	61	11971577399	7/1/2011	9/30/2011		\$115,626	\$55,982	\$47,521	\$124,087		\$45,000	\$45,000
F3A	Q3	A	11/8/2011	63	11952787473	7/1/2011	9/30/2011		\$115,626	\$55,982	\$47,521	\$124,087		\$45,000	\$45,000
F3A	Q3	A	12/13/2011	63	11953224610	7/1/2011	9/30/2011		\$120,157	\$55,982	\$47,521	\$126,618		\$45,000	\$45,000
F3N	YE	N	1/30/2012	43	12870171237	10/1/2011	12/31/2011		\$126,618	\$37,500	\$42,312	\$123,805		\$45,000	\$45,000
F3N	Q1	N	4/13/2012	49	12951386554	1/1/2012	3/31/2012		\$123,805	\$12,300	\$77,804	\$58,301		\$18,790	\$18,790
F3A	Q1	A	10/18/2012	50	12972718842	1/1/2012	3/31/2012		\$123,805	\$12,310	\$77,814	\$58,301		\$18,790	\$18,790
F3N	12P	N	5/16/2012	36	12951783156	4/1/2012	5/9/2012		\$58,301	\$74,239	\$40,901	\$91,636		\$18,790	\$18,790
F3A	12P	A	5/27/2012	37	12951901790	4/1/2012	5/9/2012		\$56,301	\$74,239	\$42,901	\$89,636		\$18,790	\$18,790
F3A	12P	A	6/21/2012	37	12971375408	4/1/2012	5/9/2012		\$56,301	\$74,239	\$43,546	\$88,992		\$18,790	\$18,790
F3A	12P	A	7/26/2012	39	12952588762	4/1/2012	5/9/2012		\$56,301	\$74,239	\$43,546	\$88,992		\$18,790	\$18,790
F3A	12P	A	10/18/2012	39	12972718892	4/1/2012	5/9/2012		\$56,301	\$74,239	\$43,546	\$88,992		\$18,790	\$18,790
F3N	Q2	N	7/13/2012	53	12952420095	5/10/2012	6/30/2012		\$88,992	\$104,275	\$45,414	\$147,852		\$18,790	\$18,790
F3A	Q2	A	7/26/2012	53	12871834681	5/10/2012	6/30/2012		\$88,992	\$104,275	\$45,414	\$147,852		\$18,790	\$18,790
F3A	Q2	A	10/18/2012	53	12954460933	5/10/2012	6/30/2012		\$88,992	\$104,275	\$45,414	\$147,852		\$18,790	\$18,790
F3N	Q3	N	10/15/2012	66	12972545355	7/1/2012	9/30/2012		\$147,852	\$63,225	\$137,651	\$73,426		\$18,790	\$18,790
F3A	Q3	A	10/18/2012	66	12972718931	7/1/2012	9/30/2012		\$147,852	\$63,225	\$137,651	\$73,426		\$18,790	\$18,790
F3N	12G	N	10/25/2012	22	12940425517	10/1/2012	10/17/2012		\$73,426	\$27,558	\$112,733	\$88,811		\$18,790	\$18,790
F3A	12G	A	1/24/2013	22	13960463865	10/1/2012	10/17/2012		\$73,426	\$27,558	\$110,239	\$90,746		\$18,790	\$18,790
F3N	30G	N	1/26/2012	25	12962629535	10/18/2012	11/26/2012		\$68,811	\$25,900	\$34,505	\$80,205		\$18,790	\$18,790
F3A	30G	A	1/24/2013	25	13960463887	10/18/2012	11/26/2012		\$90,746	\$25,900	\$34,505	\$82,140		\$18,790	\$18,790
F3N	YE	N	1/24/2013	20	13960463912	11/27/2012	12/31/2012		\$82,140	\$1,000	\$34,173	\$48,967		\$18,790	\$18,790
F2		N	4/11/2011	2	11030580993										
F6N		N	5/26/2012	2	12651901717										

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Hall for Congress Committee (Ralph Hall - Rockwall, Texas) (C00120683)

2014 July Quarterly Report/Amended 2014 July Quarterly Report

Overview of Additional Debt

Report Line	original 2014 July Quarterly Report, received 7/15/14 (Image 14961579955)	Amended 2014 July Quarterly Report, received 4/15/15 (Images 15970343772 and 15970343834)	Debt Variance Amount	Actual Increase in New Debts Incurred
Amount Incurred This Period (Schedule D)	\$0.00	\$330,000.00	\$330,000.00	\$330,000.00
Outstanding Balance Beginning This Period (Schedule D)	\$0.00	\$0.00	\$0.00	
Payments This Period (Schedule D)	\$0.00	\$0.00	\$0.00	
Outstanding Balance at Close of This Period (Schedule D)	\$0.00	\$330,000.00	\$330,000.00	
Line 10: Debts and Obligations Owed by the Committee ¹	\$148,790.44	\$478,790.44	\$330,000.00	

¹ Line 10 (Debts and Obligations Owed by the Committee) includes both loans and debts owed to the Committee. The Committee disclosed \$148,790.44 in loans on Line 10 in addition to the debts disclosed on the line.

Hall for Congress Committee (Ralph Hall - Rockwall, Texas) (C00120683)

2014 July Quarterly Report/Amended 2014 July Quarterly Report

Additional Debts by Vendor

Vendor	Debt Amount Incurred
Booker Industries	\$330,000.00
Total	\$330,000.00